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June 13, 2005

Mary Cottrell
Secretary
Department of Telecommunications and Energy
One South Station
Boston, Mass. 02110

RE: Bay State Gas, DTE 05-27 – MASSCAP et al. support of Local 273's Motion to Preserve Status Quo

Dear Secretary Cottrell:

MASSCAP et al. files this statement in support of Local 273's Motion to Preserve Status Quo out of a concern for, among other things, the Company's customer service quality.

The General Court has given this Department the jurisdiction and responsibility to protect the Company's ratepayers from the demonstrably deleterious service impacts of outsourcing as well as to protect the Company's workers from unlawful cuts in staffing levels. This jurisdiction and responsibility has little meaning if the Company is free to cut staffing levels and endanger service quality at the time the question of the Company's authority to do so is pending before this Department. The Department should freeze the status quo on the contested actions until it is able to gather the facts and arguments to determine the lawfulness of the Company's proposed actions.

Furthermore, the fact of its intended outsourcing is a known and measurable change to the test year, apparently well known to the Company, which should therefore be required to assure the Department that its filing in this case is consistent with all known facts.

Respectfully submitted,

MASSCAP et al., by

Jerrold Oppenheim

cc: Hearing Officer, Service List